



FRANK & ASSOCIATES, P.C.
THE WORKPLACE LAW FIRM

NEIL M. FRANK, ESQ.
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February 7, 2014

VIA ECF

The Honorable Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers 1217, Courtroom 13-D
Brooklyn, New York 11201

Re: *Jones v. East Brooklyn Security Services Corp. and Winchester Key*
11 CV 6333 (JG)(SMG)

Dear Judge Gold:

This firm represents Plaintiff in the above referenced action. We write to provide the Court with a status report for the case. As of today, all discovery has been completed and there are no outstanding items pending. If Defendants had intended to move for summary judgment, the deadline for submission of the pre-motion conference application has long since past. Plaintiff stands ready to proceed to trial and respectfully requests that the Court provide the next available date.

Thank you for your kind consideration of this request.

Respectfully submitted,

FRANK & ASSOCIATES, P.C.

A handwritten signature in black ink, appearing to read 'E. Sample, II.', is written over the printed name of Edward L. Sample, II. The signature is stylized and fluid.

Edward L. Sample, II.

cc: Dov Medinets (via ECF)
Martin Wolf (via ECF)